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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91204698
Party	Defendant Books Without Borders (Kutub Bila Hudood) by change of name from Books Without Borders (Kutub Bila Hudud)
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Submission	Motion to Amend/Amended Answer or Counterclaim
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Date	05/24/2012
Attachments	Amendment to Answer - BWB.pdf (3 pages)(11137 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<p>BUREAU INTERNATIONAL DE MÉDECINS SANS FRONTIÈRES</p> <p>and</p> <p>MÉDECINS SANS FRONTIÈRES USA, INC.,</p> <p style="text-align:right">jointly, Opposer,</p> <p style="text-align:center">v.</p> <p>BOOKS WITHOUT BORDERS (KUTUB BILA HUDOOD),</p> <p style="text-align:right">Applicant.</p>	<p>Opposition No. 91204698</p> <p>Application Serial No. 85/180,994</p> <p>Mark: BOOKS WITHOUT BORDERS</p> <p>Filing Date: November 19, 2010</p>
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**AMENDMENT TO APPLICANT’S ANSWER TO NOTICE OF OPPOSITION FOR
“BOOKS WITHOUT BORDERS”**

Pursuant to 37 C.F.R. 2.107(a), Applicant, BOOKS WITHOUT BORDERS (KUTUB BILA HUDOOD), by and through undersigned counsel, hereby amends Applicant’s Answer to Notice of Opposition filed on May 22, 2012, as set forth below:

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The second paragraph under the caption “Defense #1: No Likelihood of Confusion” is amended to state:

- 1) Opposer’s mark is weak and has lost any distinctiveness. The term “Without Borders” has become merely descriptive due to its widespread use by third parties providing various goods and services. A search for the term, “Without Borders,” on the U.S. Patent and Trademark Office’s Trademark Electronic Search System

(TESS) returned 126 live registered marks and applications for registration.¹
Some examples of registered marks are: “PEOPLE WITHOUT BORDERS,”
“VETERINARIANS WITHOUT BORDERS,” “KNOWLEDGE WITHOUT
BORDERS,” “LAWYERS WITHOUT BORDERS,” “MINISTRIES WITHOUT
BORDERS,” and “TEACHERS WITHOUT BORDERS.”

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The fourth paragraph under the caption “Defense #2: No Dilution or Blurring” is amended to state:

- 3) There are numerous third-party registrations and applications for marks containing the term “Without Borders.” A search for the term “Without Borders” on the U.S. Patent and Trademark Office’s Trademark Electronic Search System (TESS) returned 126 live registered marks and applications for registration.⁴
Some examples of registered marks are: “PEOPLE WITHOUT BORDERS,”
“VETERINARIANS WITHOUT BORDERS,” “KNOWLEDGE WITHOUT
BORDERS,” “LAWYERS WITHOUT BORDERS,” “MINISTRIES WITHOUT
BORDERS,” and “TEACHERS WITHOUT BORDERS.”

Dated: May 24, 2012

Respectfully submitted,

/Betsy E. Lehrfeld/
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¹ Exhibit 1 (Printout of TESS search results for “without borders” as of May 18, 2012)

⁴ Exhibit 1 (Printout of TESS search results for “without borders” as of May 18, 2012)

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the AMENDMENT TO APPLICANT'S
ANSWER TO NOTICE OF OPPOSITION was served via first-class mail, postage prepaid, on the
24th day of May, 2012, upon Counsel for Opposer at the following address:

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